

NITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	Case No. 2:21-cr-00131 JTM
)	
CALEB JAMES MOORE,)	
)	
Defendant.)	

UNITED STATES' NOTICE OF ADDITIONAL AUTHORITY

Comes now the United States of America, by its counsel, Clifford D. Johnson, United States Attorney for the Northern District of Indiana, through Nicholas J. Padilla, Assistant United States Attorney, and gives notice to the Defendant and the Court of additional authority.

1. Pending before the Court is Defendant's "Motion to Dismiss Under the Second Amendment." DE 64. Defendant argues that the charge brought under 18 U.S.C. § 924(a)(1)(A) is unconstitutional in light of *New York State Rifle Pistol Assn. v. Bruen*, 142 S.Ct. 2111 (2022). The matter is fully briefed before the Court. DE 68.

2. On March 15, 2023, the United States District Court for the Northern District of Indiana in the Hammond Division ruled on this same issue in *United States v. Jordan Campbell*, 2:22-CR-23-PPS, DE 31. The court held that 18 U.S.C. § 922(a)(6) and 18 U.S.C. § 924(a)(1)(A) remain constitutional post-*Bruen*. Judge Simon's opinion is attached as Exhibit 1.

WHEREFORE, the government provides notice to the Court of this relevant additional authority.

Dated: March 20, 2023

Respectfully submitted,

CLIFFORD D. JOHNSON
UNITED STATES ATTORNEY

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